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for notice and a hearing, as did the Oregon statute; since employers have no vested right to employ women and minors. This view would seem to accord with Judge Cooley's definition of a vested right quoted in *Pearsall v. Great Northern Ry.*, 161 U. S. at 673, as the right to enjoyment, present or prospective, that has become the property of some person or persons as a present interest. The court's further holding that the power delegated to the Commission by the Legislature was purely administrative seems based on principles equally obvious. The legislature itself had settled the only question of policy involved, that is that an amount adequate for maintenance should be established as a minimum wage. There is ample authority to establish the principle that it could delegate to a commission the administrative duty of determining the fact of what amount would be adequate for maintenance and provide that upon the establishment of this fact the law should be operative, *Field v. Clark*, 143 U. S. at 692.

MUNICIPAL CORPORATIONS—POWER TO ACT AS TRUSTEE—BURIAL LOT.—A bequest was left to a town on condition that the town care for a cemetery lot in which testator's family lay buried. Upon petition by the executor for a construction of the will, *held*, that the bequest created a valid trust which the town had authority to accept. *Petition of Tuttle*, (N. H., 1921) 112 Atl. 397.

A municipal corporation may take and hold property as a gift or devise from an individual in trust for specified purposes when the trust created is germane to the purposes for which the corporation was organized, and when the administration of the trust and the liabilities which it may impose are not foreign to the declared objects of the corporation. *Hatheway v. Sackett*, 32 Mich. 97. Justice Story's opinion in *Vidal v. Girard's Executors*, 2 How. (U. S.) 127, is particularly clear on this point. Historically, bequests to cities for trust purposes have long been recognized. One of the earliest of these gifts in this country is that of Dr. Franklin to the cities of Philadelphia and Boston, where the fund was used to help young married artificers. Gifts to charitable uses are highly favored and liberally construed to accomplish the intent of the donor. *Woodruff v. Marsh*, 63 Conn. 125; *Harrington v. Pier*, 105 Wis. 485. A bequest to a city as a trust to provide for the education of the poor was upheld in *McDonogh v. Murdock*, 14 U. S. 732. Bequests have also been upheld for beautifying public grounds, and for establishing hospitals. *Penny v. Croul*, 76 Mich. 471; *Dykeman v. Jenkins*, 179 Ind. 549. The care of cemeteries has generally been recognized as a proper municipal function within the public health duties of a city. *Davorck v. Moore*, 105 Mich. 120. The rule against perpetuities does not apply to gifts for charitable uses. *Mills v. Davison*, 54 N. J. Eq. 659. A perpetual trust cannot be created for an individual and his heirs in succession, forever; and it is here that a charity differs, for a trust may be established which contemplates the payment of the income of a certain fund to some charitable purpose forever. 2 PERRY ON TRUSTS, 687. The power of the legislature to alter and abolish municipal corporations is not defeated by the circumstances that the city is a trustee of a charity, or of other private rights and interests. 1 DILLON 181. See 14 L. R. A. (N. S.) 49; 10 MICH. L. REV. 31, 120.